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BEFORE THE ARIZONA CORPORATIO

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Arizona Corporation Commission DOCKETE

JAN 27 2016

DOCKETED BY

IN THE MATTER OF THE APPLICATION OF) UNS ELECTRIC, INC. FOR THE ESTABLISHMENT OF JUST AND REASONABLE RATES AND CHARGES DESIGNED TO REALIZE A REASONABLE RATE OF RETURN ON THE FAIR VALUE OF) THE PROPERTIES OF UNS ELECTRIC, INC. DEVOTED TO ITS OPERATIONS THROUGHOUT THE STATE OF ARIZONA, AND FOR RELATED APPROVALS.

DOCKET NO. E-04204A-15-0142

RESPONSE OF SWEEP AND WRA TO AURA'S MOTION TO EXTEND PROCEDURAL SCHEDULE

The Southwest Energy Efficiency Project ("SWEEP") and Western Resource Advocates ("WRA") respond to the Motion to Extend Procedural Schedule filed by the Arizona Utility Ratepayer Alliance ("AURA") as follows.

SWEEP and WRA support AURA's Motion for the reasons specified in that Motion. Staff's recommendation in this docket for mandatory demand charges for all residential customers and the company's adoption of that recommendation in its rebuttal testimony turned this into a whole new rate case. Intervenors will be attempting to do extensive discovery in the compressed timeframe while at the same time identifying potential new witnesses. Had the proposal been made by the company in its initial testimony in the case, the Intervenors would have had time to prepare. Coming in the middle of the testimony as the Staff recommendation and company's rebuttal does, places an enormous burden on Intervenors for which additional time is required to properly evaluate the Staff and company's proposal and respond to it.

Additionally, there may be other groups interested in participating as a party in this case as a result of the Staff and company proposal. They would have had no knowledge when this case was filed that such a sweeping change was going to be proposed by Staff and adopted by the company in the middle of filing testimony. It is only fair that other individuals and groups be given an opportunity to intervene and participate meaningfully in this docket.

Finally, SWEEP and WRA support RUCO's comments in its response to AURA's Motion. In particular, SWEEP and WRA support the extension for the time to intervene as well as RUCO's recommendation that the Commission schedule public meetings in the company's service territory and in Phoenix to allow input on the rate design proposal and other subjects related to the application. RUCO states that the company's proposal to make residential demand charges mandatory "is a major change from the current rate design and is supported by other utilities in this state..." If the Commission's decision in this case is going to inform its decisions in the other rate cases, then ratepayers throughout Arizona should be allowed an appropriate forum to provide their comments.

RESPECTFULLY SUBMITTED this 27th day of January 2016.

Timothy M. Hogan

Arizona Center for Law in the Public Interest

514 W. Roosevelt Street Phoenix, Arizona 85003

Attorney for Southwest Energy Efficiency Project and Western Resource Advocates

ORIGINAL and 13 COPIES of the foregoing filed this 27th day of January, 2016, with:

Docketing Supervisor Docket Control

Arizona Corporation Commission

1200 W. Washington Phoenix, AZ 85007 COPIES of the foregoing electronically mailed this 27^{th} day of January, 2016 to:

All Parties of Record

Them